

Exhibit P

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

STUDENTS FOR FAIR ADMISSIONS,
INC.,

Plaintiff,

v.

Case No. 1:20-cv-763-RP

UNIVERSITY OF TEXAS AT AUSTIN, et
al.,

Defendants.

DECLARATION OF EDWARD J. BLUM

I, Edward J. Blum, pursuant to 28 U.S.C. §1746, declare the following:

1. I am an individual over eighteen years of age, and of sound mind, who has never been convicted of a felony, is capable of making this declaration, and am fully competent to declare as to matters stated herein.

2. I am the President of Students for Fair Admissions, Inc. (“SFFA”). SFFA is an Internal Revenue Code Section 501(c)(3), voluntary membership organization formed for the purpose of defending human and civil rights secured by law, including the right of individuals to equal protection under the law, through litigation and other lawful means. More specifically, SFFA promotes and protects the right of the public to be free from discrimination on the basis of race in higher-education admissions. To my knowledge, SFFA is the only membership organization in the country dedicated to these principles.

3. SFFA is a nonprofit membership organization of more than 20,000 students, parents, and others who believe that racial classifications and preferences in college admissions are unfair, unnecessary, and unconstitutional. SFFA has members in Texas and throughout the country.

4. SFFA has at least two members (“Standing Member 1 and Standing Member 2”) who applied for and were denied admission to UT’s 2018 and 2019 entering classes, respectively.

5. Standing Member 1, who is white, applied for and was denied admission to UT’s 2018 entering class.

6. Standing Member 1 was accepted to and enrolled at another university in Texas.

7. Standing Member 1 is ready and able to apply to transfer to UT when it stops discriminating against applicants on the basis of race and ethnicity.

8. Standing Member 1 was deposed by UT and the Defendant-Intervenors on February 1, 2021.

9. Standing Member 2, who is white, applied for and was denied admission to UT’s 2019 entering class.

10. Standing Member 2 was accepted to and enrolled at another university in Texas.

11. Standing Member 2 is ready and able to apply to transfer to UT when it stops discriminating against applicants on the basis of race and ethnicity.

12. Standing Member 2 was deposed by UT and the Defendant-Intervenors on February 2, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, April 3, 2021.

Edward J. Blum

A handwritten signature in black ink, appearing to read "Edward J. Blum", written over a horizontal line.